

Isabelle Ord, Cal. Bar No. 198224 (*pro hac vice* admitted)

E-mail: isabelle.ord@us.dlapiper.com

Andrew Serwin, Cal. Bar No. 179493 (*pro hac vice* admitted)

E-mail: andrew.serwin@us.dlapiper.com

Jeffrey DeGroot, WSBA No. 46839 (*pro hac vice* admitted)

E-mail: jeffrey.degroot@us.dlapiper.com

DLA PIPER LLP (US)

555 Mission Street

San Francisco, California 94105-2933

Tel: 415.836.2500

Fax: 415.836.5201

Jennifer K. Hostetler, SBN 11994

E-mail: jhostetler@lewisroca.com

LEWIS ROCA ROTHGERBER CHRISTIE LLP

3993 Howard Hughes Parkway, Suite 600

Las Vegas, Nevada 89169-5996

Tel: 702.949.8200

Attorneys for Defendants

FARMERS GROUP, INC., FARMERS INSURANCE EXCHANGE,  
and 21st CENTURY INSURANCE COMPANY

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

RONALD STALLONE, on behalf of himself  
and all other persons similarly situated,

Plaintiff,

v.

FARMERS GROUP, INC., a Nevada  
Corporation; FARMERS INSURANCE  
EXCHANGE; and 21st CENTURY  
INSURANCE COMPANY,

Defendants.

Case No. 2:21-cv-01659-GMN-MDC

**STIPULATION AND [PROPOSED]  
ORDER TO STAY ALL DEADLINES TO  
FINALIZE SETTLEMENT**

**THIRD REQUEST**

STIPULATION AND [PROPOSED]  
ORDER TO STAY ALL DEADLINES  
TO FINALIZE SETTLEMENT

DLA Piper LLP (US)  
701 Fifth Avenue, Suite 6900  
Seattle, WA 98104-7044 | Tel:  
206.839.4800

1 Pursuant to the Court's May 8, 2024 order, ECF No. 84, Plaintiff Ronald Stallone  
2 ("Plaintiff") and Defendants Farmers Group, Inc., Farmers Insurance Exchange, and 21st Century  
3 Insurance Company ("Defendants") (collectively, the "Parties") hereby provide the following joint  
4 status report:

5 The Parties have been working cooperatively on a settlement agreement, which they have  
6 finalized and is now in the process of being executed in full. The agreement contains provisions  
7 for the parties to complete certain steps following the execution of the agreement, including  
8 exchanging of W-9s, making of the settlement payment, and filing a notice of dismissal once those  
9 steps are completed. Accordingly, to conserve the Parties' and the Court's resources and to allow  
10 the Parties to complete their contractual obligations, the Parties respectfully request that the Court  
11 maintain the vacated case schedule for 45 days to allow the Parties to complete the steps set forth  
12 in the settlement agreement and file the notice of dismissal.

13 Subject to the Court's approval, in the unlikely event the Parties do not file a notice of  
14 dismissal within 45 days, the Parties propose they file a status report within 45 days of the date of

15 ///

16 ///

17 ///

18 ///

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

STIPULATION AND [PROPOSED]  
ORDER TO STAY ALL DEADLINES  
TO FINALIZE SETTLEMENT - 1

DLA Piper LLP (US)  
701 Fifth Avenue, Suite 6900  
Seattle, WA 98104-7044 | Tel:  
206.839.4800

this order to address the status of the Parties' contractual duties.

Respectfully submitted this 24th day of June, 2024.

By: /s/ Gayle M. Blatt

Michael Kind, SBN 13903  
E-mail: [mk@kindlaw.com](mailto:mk@kindlaw.com)  
**KIND LAW**  
8860 S. Maryland Parkway, Suite 106  
Las Vegas, Nevada 89123  
Tel: 702.337.2322

Gayle M. Blatt (CA 122048)  
(*pro hac vice admitted*)  
E-mail: [gmb@cglaw.com](mailto:gmb@cglaw.com)  
**CASEY GERRY SCHENK  
FRANCAVILLA BLATT &  
PENFIELD, LLP**  
110 Laurel Street  
San Diego, CA 92101  
Tel: (619) 238-1811

Kate M. Baxter-Kauf\* (MN #0392037)  
(*pro hac vice admitted*)  
E-mail: [kmbaxter-kauf@locklaw.com](mailto:kmbaxter-kauf@locklaw.com)  
Karen Hanson Riebel (MN #0219770)

(*pro hac vice admitted*)  
E-mail: [khriebel@locklaw.com](mailto:khriebel@locklaw.com)  
Maureen Kane Berg (MN #033344X)  
(*pro hac vice admitted*)  
E-mail: [mkberg@locklaw.com](mailto:mkberg@locklaw.com)  
**LOCKRIDGE GRINDAL NAUEN  
P.L.L.P.**

100 Washington Avenue South  
Suite 2200  
Minneapolis, MN 55401  
Tel: (612) 339-6900

Attorneys for Plaintiff Stallone

/s/ Jennifer K. Hostetler

Jennifer K. Hostetler, SBN 11994  
E-mail: [jhostetler@lewisroca.com](mailto:jhostetler@lewisroca.com)  
**LEWIS ROCA**  
3993 Howard Hughes Parkway, Suite 600  
Las Vegas, Nevada 89169-5996  
Tel: 702.474.2624

Isabelle Ord, Cal. Bar No. 198224  
(*pro hac vice admitted*)  
E-mail: [isabelle.ord@us.dlapiper.com](mailto:isabelle.ord@us.dlapiper.com)  
Andrew Serwin, Cal. Bar No. 179493  
(*pro hac vice admitted*)  
E-mail: [andrew.serwin@us.dlapiper.com](mailto:andrew.serwin@us.dlapiper.com)  
Jeffrey DeGroot, WSBA No. 46839  
(*pro hac vice admitted*)  
E-mail: [jeffrey.degroot@us.dlapiper.com](mailto:jeffrey.degroot@us.dlapiper.com)  
**DLA PIPER LLP (US)**

555 Mission Street  
San Francisco, California 94105-2933  
Tel: 415.836.2500

Attorneys for Defendants  
FARMERS GROUP, INC., FARMERS  
INSURANCE EXCHANGE, AND 21st  
CENTURY INSURANCE COMPANY

IT IS SO ORDERED.

  
\_\_\_\_\_  
U.S. DISTRICT COURT JUDGE

STIPULATION AND [PROPOSED]  
ORDER TO STAY ALL DEADLINES  
TO FINALIZE SETTLEMENT - 2

DLA Piper LLP (US)  
701 Fifth Avenue, Suite 6900  
Seattle, WA 98104-7044 | Tel:  
206.839.4800